

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.,

Plaintiff,

v.

WARDEN THOMAS CARROLL,  
CORRECTIONAL MEDICAL SERVICES,  
STAN TAYLOR, and JOYCE TALLEY,

Defendants.

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C. A. No. 07-015-JJF

TRIAL BY JURY OF  
TWELVE DEMANDED

**DEFENDANTS CORRECTIONAL MEDICAL SERVICES'**  
**FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS**  
**DIRECTED TO PLAINTIFF**

Pursuant to Rule 34 of the Federal District Court Rules of Civil Procedure, you are hereby requested to produce the below listed documents and/or items for purposes of discovery. This material will be examined and/or photocopied; photograph negatives will be processed and photographs reproduced. Said documents and items are to be produced at the offices of Marks, O'Neill, O'Brien & Courtney, P.C., 913 Market Street, Suite 800, Wilmington, Delaware 19801, and supplemented thereafter in accordance with the Rules of Civil Procedure.

If any document required to be produced by this Request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your Response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your Response.

**REQUESTS**

1. Any and all statements, descriptions of statements, summaries of statements, memoranda, records or writing (signed or unsigned) of any and all witnesses, including any statements from the parties herein, or their respective agents, servants or employees, including tapes or other mechanically transcribed information.

**RESPONSE:**

2. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared.

**RESPONSE:**

3. Any and all reports compiled or prepared by an individual who has been retained as an expert in this matter.

**RESPONSE:**

4. The names, home and business addresses of all experts contacted.

RESPONSE:

5. All writings, memoranda, date and/or tangible things which related directly or indirectly to the incident and damages set forth in Plaintiff's Complaint.

RESPONSE:

6. Any and all copies of Internal Revenue Service Tax Returns for five full years prior to, and all years subsequent to the date referred to in Plaintiff's Complaint.

RESPONSE:

7. Any and all documents, records, evidence and anything whatsoever which will be introduced at trial for use in direct examination or impeachment.

RESPONSE:

8. Any document or thing the plaintiff has read or referred to in preparation of any pleadings in the instant case.

RESPONSE:

Marks, O'Neill, O'Brien & Courtney, P.C.

By: Patrick G. Rock  
Patrick G. Rock, Esquire (I.D. # 4632)  
Megan T. Mantzavinos, Esquire (I.D. # 3802)  
913 North Market Street, Suite 800  
Wilmington, DE 19801  
(302) 658-6538  
*Attorney for Defendant CMS*

DATED: Aug. 13, 2007

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**Certificate of Service**  
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I, Patrick G. Rock, Esquire of Marks, O'Neill, O'Brien & Courtney, P.C. hereby certify that on this 14<sup>th</sup> day of August, 2007, I electronically filed **Defendants' First Set of Interrogatories and First Set of Request for Production of Documents Directed to Plaintiff** with the Clerk of Court using CM/ECF and will send via first class mail, postage prepaid, said documents to the following:

Inmate William Francis, Jr., *Pro Se*  
SBI# 264560  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

—  
  
/s/ Patrick G. Rock

Patrick G. Rock, Esquire / I.D. No. 4632  
Marks, O'Neill, O'Brien & Courtney, P.C.  
913 North Market Street, #800  
Wilmington, DE 19801  
(302) 658-6538

*Attorney for Defendants*